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Kelly D. Johnston
Executive Vice President,
Government Affairs and Communications
National Food Processors Association

The President's Food Safety Council
Food Safety Vision Statement
October 2, 1998

Mister Chairman. thank you for the opportunity to offer comments on the Council's vision statement. Given your time restraints. I will dispense with the usual preliminaries except to note that I am Kelly Johnston, Executive Vice President for Government Affairs and Communications, with the National Food Processors Association.

As we construct any concise statement about the shape and the goals of our country's food safety system, six specific elements are essential and must be emphasized in words and realized in actions. Let me list them without ado and offer a few sparse comments as we go.

Research: There remains one persistent problem that impedes other forms of research and has a crippling effect on accurate risk assessment: factual statistics. Lacking unassailable data numbers become the swampy domain of junk science and agenda politics. Harm is inflicted on everyone, it seems, except those who employ such tactics to justify their pretexts. Accurate statistics advance the discussion; floating estimates contaminate the debate.

Unified policy: Without debating "single agency" proposals, let me express our staunch support for a unified food safety policy, which today's forum and the emerging process contemplates, I believe. Our nation's food safety scheme evolved to meet changing challenges to consumers' health and the legal and regulatory schemes designed to protect them, and they have. Along the way, each agency, each system, developed unique approaches to meet singular needs and that's as it should be. Still, some overarching policy is needed to provide cohesion and to open avenues for the smooth and productive flow of ideas, research, and expertise. Disagreements will arise, but it's imperative for everyone to travel using the same map.

Science-based: If we were to say that some parts of the food safety net are more equal than others, this would be at the top of the list. **Any valid and effective** scheme must employ sound, proven, accepted, **and** objective scientific methods. Otherwise it lacks integrity and degenerates into an untrustworthy, unreliable, and **indefensible** system incapable of adequately protecting consumers' health.

Risk-based: This is another **linchpin**. If the system cannot automatically discern between real threats to the health of consumers and mere technical infractions, the allocation of resources will produce truly dangerous inconsistencies, shortfalls in protection, or worse. Prioritizing real or potential hazards and balancing the severity of the **threats** against the resources needed to combat them stands at the core of our efforts. I believe we can agree on and achieve something so basic and indispensable.

Enforcement: Enforcement is necessary, of course, but constant, m-plant, in-field, and end-product testing is costly, labor intensive, and, perhaps, outdated. **A** system-wide inspection scheme verified by random, plant- and field-specific tests would provide ample protection and a new flexibility so that agencies could redeploy manpower and money to high risk hazards.

Private sector: ~~The federal government~~ does not stand ~~alone~~ to combat bad product--its agencies are a small part of a legion of food company scientists. This, too, is as it should be--because it works. **Any** conscious failure to process and produce safe food would lead to such losses in reputation, customers, sales, and so forth as to be unthinkable. Free market incentives and a desire to process safe and enjoyable food can yield astonishing results.

Conclusion: Let me conclude by guaranteeing NFPA's willingness to help construct and implement a food safety scheme that contains at least these elements, and by inviting you to call on us, our regulatory specialists, and our scientists to advance this enterprise.

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